

(Caption of Case)  
IN RE:Application of South Carolina Electric & Gas  
Company for Increases and Adjustments in Electric  
Rate Schedules and TariffsBEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET

NUMBER: 2009 - 489 - E

(Please type or print)

Submitted by: E. Wade Mullins, IIISC Bar Number: 3525Address: PO Box 61110Telephone: 803-252-7693Columbia, SC 29260Fax: 803-254-5719

Other: \_\_\_\_\_

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition      ☐ Request for item to be placed on Commission's Agenda expeditiously
☐ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

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March 16, 2010

## **VIA HAND DELIVERY**

The Honorable Charles L.A. Terreni  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210


**RE: Application of South Carolina Electric & Gas Company for Increases and  
Adjustments in Electric Rate Schedules and Tariffs  
Docket No. 2009-489-E  
Petition to Intervene of CMC Steel South Carolina**

Dear Mr. Terreni:

Enclosed for filing please find the original and ten (10) copies of the **Petition to Intervene of CMC Steel South Carolina** in the above-referenced matter. I have also enclosed two extra copies of the Petition and would appreciate you file stamping the extra copies and returning it to me via courier. By copy of this letter, I am serving all parties of record. If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,



E. Wade Mullins, III

EWM/kw

cc: Damon E. Xenopoulos, Esquire (w/enc.)  
Mitchell Willoughby, Esquire (w/enc.)  
Shannon B. Hudson, Esquire (w/enc.)  
K. Chad Burgess, Esquire (w/enc.)  
Catherine D. Taylor, Esquire (w/enc.)

RECEIVED  
MARCH 17 2010  
PUBLIC SERVICE COMMISSION

**BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**Application of South Carolina Electric &  
Gas Company for Increases and  
Adjustments in Electric Rate Schedules  
and Tariffs**

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**Docket No. 2009-489-E**

**PETITION TO INTERVENE OF CMC STEEL SOUTH CAROLINA**

CMC Steel South Carolina ("CMC") hereby petitions to intervene in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1) CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This process requires CMC to purchase large quantities of natural gas from South Carolina Electric & Gas Company ("SCE&G").

2) Due to the unique characteristics of its load, CMC cannot be represented adequately by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3) CMC's mailing address is:

CMC Steel South Carolina  
310 New State Road  
Cayce, SC 29033

4) CMC is represented by Damon E. Xenopoulos, Esq. of the Washington, D.C. law firm of Brickfield, Burchette, Ritts & Stone, P.C. in various energy matters. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 S.(1)(b) of the Commission's Rules of Practice and Procedure, Damon E. Xenopoulos, Esq. will associate with E. Wade Mullins, III, Esq.

and Joey R. Floyd, Esq. of Bruner, Powell, Robbins, Wall & Mullins, LLC, local counsel licensed to practice in South Carolina. An appropriate Motion for Admission Pro Hac Vice will be filed with the Commission. Service and correspondence regarding this proceeding should be sent to all of the undersigned.

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted.

A handwritten signature in black ink, appearing to read "E. Wade Mullins, III". The signature is fluid and cursive, with the last name "Mullins" being particularly prominent.

E. Wade Mullins, III, Esq.  
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*Attorneys for CMC Steel South Carolina*

**Docket No. 2009-489-E**

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J. Wake Mally

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